

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO
LAS CRUCES DIVISION

**SANJUANA QUIROZ, Individually and on
Behalf of All Others Similarly Situated**

PLAINTIFF

vs.

No. 2:21-cv-1197-KRS-DLM

DCT ENTERPRISES OF NEW MEXICO, LLC

DEFENDANT

**DECLARATION OF SAMUEL BROWN REGARDING
SUPPLEMENTAL ATTORNEYS' FEES**

I, Samuel Brown, do hereby swear, affirm, and attest as follows, based upon my personal knowledge of the matters contained herein:

1. My name is Samuel Brown, and I am over the age of eighteen (18) and duly qualified to execute this declaration.

2. I am a resident and domiciliary of the State of Arkansas.

3. I am an attorney licensed in the state and federal courts of Arkansas, as well as the Eastern District of Texas.

4. I have three (3) years of experience as an attorney, all of them as a settlement specialist in Fair Labor Standards Act wage-and-hour practice, including collective actions.

5. Consistent with the Declaration of Josh Sanford submitted with Plaintiff's Motions for Default Judgment, see ECF Nos. 9-3 & 20-3, my hourly rate billed on this matter is \$220.00 per hour.

6. I have billed 2.9 hours to this matter for purposes of preparing for and attending the hearing on Plaintiff's Second Motion for Default Judgment.

7. The following is a breakdown of this billed time by subject.
 - a. 0.2 hours: Composed electronic communications to Plaintiff regarding the date, time, and method of appearance for upcoming hearing as well as preparations for it.
 - b. 0.5 hours: Performed legal research regarding applicable standards for tip credits, mileage reimbursement, and default judgments.
 - c. 1.2 hours: Telephone conferences with Plaintiff regarding upcoming hearing and requested information from Court.
 - d. 1 hour: Attended default judgment hearing.
8. No additional costs have been billed to this matter in connection with the hearing.
9. In total, Plaintiff requests \$638.00 in additional attorneys' fees in connection with the hearing (\$220.00 x 2.9).

PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on this day October 17, 2023.

/s/ Samuel Brown
SAMUEL BROWN